

RONALD PHILLIPS - Re: FW: EEOC v. LAWL -- Discovery Matters

From: RONALD PHILLIPS
To: Karetnick, Aliza R.
Date: 10/4/2005 5:51 PM
Subject: Re: FW: EEOC v. LAWL -- Discovery Matters
CC: pjwhite@ober.com

Aliza:

I apologize for not responding earlier. I was out of the office yesterday and busy with various matters today.

In light of the holidays, and in the spirit of cooperation, EEOC agrees that your client should have an extension. At this time, EEOC believes that a seven (7) calendar day extension beyond October 6th within which to submit a letter or call to EEOC in an attempt to resolve our dispute is appropriate. In addition, EEOC agrees that Defendant should have seven (7) calendar days after receiving EEOC's response to the letter or call within which Defendant shall serve its Motion to Compel. This is, in effect, a minimum of a 14-day extension (not inclusive of time required for EEOC to respond to the letter or call). EEOC will not commit to respond to a letter or phone discussion by a specific date (because the nature and scope of any response that EEOC deems appropriate is, of course, in part contingent on its counsel's availability as well as the content of Defendant's communications); however, your client is free to conclude that if EEOC does not respond to your client's letter or phone discussion within a reasonable timeframe, it should move forward with a Motion to Compel.

Please call if you wish to discuss this e-mail.

Ron Phillips
EEOC
(410) 962-4628

>>> "Karetnick, Aliza R." <akaretnick@WOLFBLOCK.com> 10/4/2005 9:47:57 AM >>>

Ron:
Does EEOC have any response to the attached?

-----Original Message-----

From: Karetnick, Aliza R.
Sent: Mon Oct 03 06:35:56 2005
To: 'RONALD PHILLIPS'
Subject: EEOC v. LAWL -- Discovery Matters

Ron:

I write seeking an extension of time within which to resolve the discovery dispute relating to Defendant's Fifth Set of Interrogatories and/or within which to file a motion to compel with the Court. According to our calendar, the deadline for LAWL to file a motion compelling responses is October 6, 2005. As you are aware, LAWL has neither drafted a letter nor held a conference call detailing the deficiencies in EEOC's responses to the Interrogatories. Accordingly, LAWL proposes the following: LAWL will provide EEOC with a letter no later than Tuesday, October 18. EEOC's deadline to respond to that letter will be October 28. If EEOC does not respond and/or the discovery dispute between the parties cannot be resolved, LAWL will have until November 7 to file its motion to compel.

Please advise as soon as possible if the proposed extension and deadlines are acceptable to EEOC.

Thank you.

Aliza R. Karetnick
Wolf, Block
1650 Arch Street -- 22nd Floor
Philadelphia, PA 19103
Tel: (215) 977-2124
Fax: (215) 405-3724